

From: Rand Crafts
To: Milka Radulovic
Date: Tuesday, January 28, 2003 4:18:11 PM
Subject: IPP OFA Discussions

Milka,

Here's how the number for Condition 12 came about...

Note that in our NOI of 9/23/02 at the bottom of the chart on page3, and in the NOI follow-up of 11/14/02, in the first paragraph on page 2, we discussed the differences in CO between calculated and actual emissions, and respective changes from those. The AP-42 tons/yr calculation ties to an emission rate of 0.022 lb/mmbtu, whereby the actual test results we provided data for showed an average on 0.041 lbs/mmbtu. The difference between each of those values and the projected value of 0.064 lbs/mmbtu is 3534 tons from the calculated value, and 2119 tons from the tested value. These are the same as discussed in the NOI. Since we modeled for 5,172 tons which is equivalent to 0.064 lbs/mmbtu, this covers the increase either way you would like to present it. Note that I had found a historical document that showed the plant was modeled for 5,468 tons /yr at the start of construction. You also have a copy of that.

As far as the next item, I proposed:

"a) Perform CO testing after the installation of overfire air to confirm that the absolute value in NOx reduction is greater than the increase in CO."

I would change and add to that paragraph as follows:

"a) Perform CO testing after the installation of overfire air to confirm that the absolute value in NOx reduction is greater than the increase in CO in all operating ranges that overfire air is used. The increase in CO shall be determined by CO testing prior to and after installation of overfire air in the boilers."

We can discuss why this should be the best language.

Thanks.

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